

UNITED STATES DISTRICT COURT
WESTERN DISTRICT OF LOUISIANA
LAKE CHARLES DIVISION

STEPHEN EDWARD PATTERSON, III	*	CIVIL ACTION NO.: 18-cv-1395
	*	JUDGE DOUGHTY
VERSUS	*	
	*	MAGISTRATE JUDGE KAY
CAPITAL CANADA CORPORATION,	*	
JBS EXPEDITE LTD.,	*	
AIG INSURANCE COMPANY OF	*	
CANADA, AND ABC INSURANCE	*	
COMPANY	*	

**SOUTHERN BRAIN & SPINE’S MOTION TO QUASH SUBPOENA TO PRODUCE
DOCUMENTS**

NOW INTO COURT, through undersigned counsel, comes Southern Brain and Spine (“SBS”) and Dr. Najeeb Thomas, non-parties to this suit, who respectfully moves to quash the subpoena to produce documents and notice of records deposition propounded on or about June 3, 2021 by plaintiff, Stephen E. Patterson, III to non-party SBS. As set forth in the Memorandum in Support attached to this Motion, Plaintiff’s should be quashed because it seeks discovery outside the permissible scope, is overly broad, unduly burdensome, and seeks the production of irrelevant, privileged, trade secret, and non-discoverable documents.

WHEREFORE, non-parties, Southern Brain and Spine and Dr. Najeeb Thomas, respectfully request the subpoena to produce records and notice of records deposition propounded on SBS by plaintiff be quashed.

Respectfully submitted,

/s/ Conrad Meyer

CONRAD MEYER (#27574)

CHEHARDY, SHERMAN, WILLIAMS

MURRAY, RECILE, STAKLUM, & HAYES,
L.L.P.

One Galleria Blvd, Suite 1100

Metairie, LA 70001

Telephone: (504) 833-5600

Facsimile: (504) 833-8080

*Attorney for Southern Brain and Spine and Dr.
Najeeb Thomas*

CERTIFICATE OF SERVICE

I certify that on June 17, 2021, the foregoing was filed electronically with the Clerk of Court using the CM/ECF system. All counsel will be served through the CM/ECF System. There are no non-CM/ECF participants.

/s/ Conrad Meyer

CONRAD MEYER (#27574)